

Report Date	Project Name	Prepared by
20 July 2022	BP Husky Toledo Refinery Lead Paint Abatement Supplemental Environmental Project	Vaughn A. Jackson Jennifer Gottschalk

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Introduction

On March 25, 2020, the United States District Court for the Northern District of Ohio entered a Clean Air Act Consent Decree among the United States, State of Ohio, and BP-Husky Refining LLC ("BPH") and BP Products North America Inc. ("BP")—the owner and operator, respectively, of the BP-Husky Toledo Refinery located in Oregon, Ohio. The Consent Decree requires the owner and operator of the refinery to fund and complete a Supplemental Environmental Project ("SEP") to abate certain residential and commercial structures from hazards imposed by lead-based paint.

Toledo-Lucas County Health Department ("TLCHD") entered into a Services Agreement with BP wherein it agreed to perform the project for the refinery with funds escrowed by BP. TLCHD plans to perform abatement on 40 to 80 homes before the project is complete. TLCHD also subcontracted with the City of Toledo to assist with the project.

The Consent Decree requires BP and BPH to submit a semi-annual report to EPA on February 15 and August 15 each year. Paragraph 64.a.5 of the Consent Decree requires that the semi-annual report include "[a] discussion of Defendants' progress is satisfying its obligations in connection with the Lead Abatement SEP under Section VIII including, at a minimum, a narrative description of activities undertaken, the status of any construction or compliance measures, including the completion of any milestones, and a summary of costs incurred since the previous report."

TLCHD prepared this semi-annual report pursuant to the terms of the Services Agreement with BP to assist BP and BPH in meeting the semi-annual reporting requirements imposed by the Consent Decree.

Project Summary

TLCHD will perform abatements on approximately 40 to 80 qualified homes during the term of this project.

Status Summary

TLCHD partnered with the City of Toledo ("COT") Department of Neighborhoods to perform lead abatement on several homes that qualify pursuant to the SEP. A total of nine (9) homes are currently going through the vetting process or are in various stages of completion. The property at 831 Woodland was completed on May 17, 2022 and has been submitted for reimbursement for the amount of \$20,744.85.



In June 2022, BP, TLCHD, and the COT met with Mary McAuliffe of the Environmental Protection Agency (EPA) to discuss the possibility of using BP funding to repair non-lead containing components of the home that will affect lead abatement work. In this case, the roof at 58 City Park was in disrepair and it has been determined that any lead abatement work would be compromised by the leaking roof. Ms. McAuliffe was able to consult with the Department of Justice, and their consent was given to deem this an eligible cost and to utilize BP SEP funding to repair the roof.

The TLCHD and the COT will also reach out to the available contractors to find out if any of the contractors needs to train or hire lead workers. BP contacted EPA to determine whether the TLCHD will be able to utilize BP funding to sponsor training and licensing for these workers.

Project Overview

	address	\$BP construction cost	Contractor Award	Contractor	Contract Close Date	Work start date	Clearance Wipe	Clearance date	Final Insp. / Completion	comments
1	BP20-831 Woodland	\$19,757.00	4/23/2021	Continental Construction	8/11/2021	12/18/2021	12/22/2021	12/23/2021	5/17/2022	Reimbursement submitted.
2	BP20-LD-1665 W Bancroft	\$39,719.00	5/5/2021	Carter Building Services	8/5/2021	3/26/2022	6/16/2022	6/17/2022		All work complete, final voucher from contractor pending before submission for reimbursement..
3	BP20-LD-253 Knower	\$25,594.00	4/23/2021	Carter Building Services	8/13/2021	7/18/2022				Under construction
4	BP20-LD-3214 Maplewood	\$26,590.00	10/19/2021	Definitive Contractors	3/23/2022					Materials anticipated week of 7/25/2022, projected work start date week of 8/8/2022.
5	BP20-LD-575 Woodville	\$18,964.00	2/1/2022	Carter Building Services	7/21/2022					Contract signing week of 7/18/2022.
6	BP20-LD-706 Brighton	\$37,644.90	6/29/2022	Ins&Outs Home Improvement						Contractor walk-through 7/21/2022.
7	BP20-LD-721 Hampton	\$20,211.86	6/23/2022	T & S Renovations	7/21/2022					Contract signing week of 7/18/2022.
8	BP20-LD-58 City Park	\$43,692.12	7/16/2022	Definitive Contractors						Project awarded, scheduling contractor walk-through
9	BP20-LD-1845 Duncan	\$12,544.14	3/15/2022	Ins&Outs Home Improvement	5/31/2022					In City contract/PO process.
		\$244,717.02								

Budget Overview

See above table.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Jennifer Gottschalk

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